

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

FRANK ROSE, MICHAEL ROSE, )  
GUY VENTURATO, and LAWRENCE )  
VENTURATO, )  
Plaintiffs, )

v. )

ROCCERA, LLC, and )  
SYAMAL GHOSH, )  
Defendants. )

Case Number: 1:09-cv-06386

Hon. District Judge Matthew Kennelly

Hon. Magistrate Judge Michael Mason

**STIPULATION OF DISMISSAL**

The undersigned parties, by their respective counsel, hereby agree and stipulate pursuant to Fed. R. Civ. P. 41(a)(1)(ii) to the dismissal of this action with prejudice in its entirety, including, without limitation, all the claims Plaintiffs allege in this action. The parties agree to incorporate the Settlement Agreement giving rise to this Stipulation into the Stipulation by contemporaneously filing the Agreement under seal. Thus, the parties intend for this Court to retain ancillary jurisdiction to enforce the terms set forth in the Agreement consistent with the principles set forth in *Kokkonen v. Guardian Life Ins. Co.*, 511 U.S. 375 (1994) and *Jessup v. Luther*, 277 F.3d 926 (7th Cir. 2002). It is further stipulated that each party shall bear its own costs and attorneys' fees.

Respectfully submitted,

FRANK ROSE, MICHAEL ROSE,  
GUY VENTURATO, and  
LAWRENCE VENTURATO

By: /s/ John D. Fitzpatrick  
One of their attorneys

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ROCCERA LLC and

SYAMEL GHOSH

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